

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

Lynn M. Connolly,

BKY No. 23-30676-KAC

Debtor.

Chapter 13

**NOTICE OF HEARING AND MOTION TO AVOID JUDGMENT LIENS
OF AMERICA EXPRESS NATIONAL BANK, AND MIDLAND CREDIT
MANAGEMENT, INC.**

TO: U.S. Trustee; Chapter 13 Trustee Gregory A. Burrell; American Express National Bank; Midland Credit Management, Inc.; and creditors and parties in interest.

1. The debtor, through her attorney Craig W. Andresen, moves the court for the relief requested below and gives notice of hearing.
2. The court will hold a hearing on this motion at 11:00 a.m. on Wednesday, May 31, 2023, in U.S. Bankruptcy Court, Courtroom 8W, U.S. Courthouse, 300 South Fourth St., Minneapolis, Minnesota.
3. Any response to this motion must be filed and served not later than Friday, May 26, 2023, which is five days before the date of the hearing. **UNLESS A RESPONSE OPPOSING THIS MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION WITHOUT A HEARING.**
4. This court has jurisdiction over this motion pursuant to 28 U.S.C. sections 157 and 1334, Bankruptcy Rule 5005 and Local Rule 1070-1. This motion arises under 11 U.S.C. section 522(f), Bankruptcy Rule 4003(d) and Local Rule 4003-1(a). This motion is filed under Bankruptcy Rule 9013 and 9014. This is a core proceeding.
5. The petition commencing this case was filed on April 11, 2023. The meeting of creditors was held and concluded on May 10, 2023. The debtor is current in her payments to the chapter 13 trustee. A plan has been proposed but has not yet been confirmed by the court.
6. The debtor's husband Robert Connolly died on December 23, 2022.
7. This motion arises under section 11 U.S.C. 522(f), Federal Rule of Bankruptcy Procedure 4003(d), and Minnesota Local Bankruptcy Rule 4003-1(a). This motion is governed by Bankruptcy Rule 9014 and Local Rules 9013-1 and 9013-2

8. The debtor is in the process of a pending home sale; it is anticipated that the closing on this sale will happen on or about June 1, 2023.
9. The debtor's Schedule C (a copy is attached and labeled Exhibit A) establishes that she has elected to use the exemptions permitted by 11 U.S.C. § 522(b), which are the Minnesota state (or non-bankruptcy) exemptions. The \$250,000.00 value of the home was based on a combination of the property tax value, Zillow, and her personal knowledge. However, the debtor has agreed to sell the home for \$245,000.00 and that is the fair market value for purposes of this motion. As of May 17, 2023, no objection has been filed to the exemptions claimed by the debtor. (A motion seeking to reduce the time to object to exemptions has been filed, seeking to reduce such time to May 31, 2023.) On the date this case was filed, and also for the preceding thirty-six years, the debtor owned and occupied the homestead premises described in Exhibit A -- and the debtor has continued to reside therein.
10. The debtor's home is encumbered by five liens: a mortgage, two judgments against Robert Connolly, and two judgments against the debtor, Lynn Connolly. The mortgagee is U.S. Bank Trust National Association. The mortgage was foreclosed by sheriff's auction foreclosure sale on October 12, 2022, and the sheriff's certificate was filed the following day, October 13, 2023. The redemption period was set to expire on April 13, 2023, but the same was extended to June 12, 2023, by the filing of this case. According to a certificate prepared on May 11, 2023, by the attorney for the mortgagee, the amount that must be paid to redeem the home from the mortgage, on June 10, 2023, is \$151,083.91. The judgment liens are:
 - a. Judgment against Lynn Connolly, in favor of American Express National Bank, docketed September 16, 2021, in District Court (Ramsey County Civil) Case No. 62-CV-21-4873, in the amount of \$34,146.94.
 - b. Judgment against Lynn Connolly, in favor of Midland Credit Management, Inc, docketed February 14, 2022, in District Court (Ramsey County Civil) Case No. 62-CV-22-800, in the amount of \$1,957.31.
 - c. Judgment against Robert Connolly, in favor of Synchrony Bank, docketed October 5, 2021, in District Court (Ramsey County Civil) Case No. 62-CV-21-5268, in the amount of \$2,600.00.
 - d. Judgment against Robert P. Connolly, in favor of American Express National Bank, docketed June 29, in District Court (Ramset County Civil) Case No. 62-CV-22-2688 in the amount of \$4,838.89.
13. The total of these five liens is \$194,627.05 ($151,083.91 + 34,146.94 + 1,957.31 + 2,600.00 + 4,838.89 = 194,627.05$). In the absence of any liens, the debtor could have claimed an exemption of \$245,000.00. Therefore, the judicial lien of American Express National Bank, and the judicial lien of Midland Credit Management, Inc., impair her exemption, within the meaning of 11 U.S.C. section 522(f)(1), which the debtor would have been entitled to claim, and she is entitled to an order avoiding the liens of American Express National Bank, and Midland Credit Management, Inc.

WHEREFORE, the debtor respectfully requests that the court issue an order avoiding the judicial liens of American Express National Bank, in the amount of \$34,146.94, and Midland Credit Management, Inc., in the amount of \$1,957.31.

Dated: 5/17/23

/e/ Craig W. Andresen
Craig W. Andresen, # 186557
Attorney for Debtors
2001 Killebrew Drive, # 150
Bloomington, MN 55425
Telephone: (952) 831-1995
craig@andresenlaw.com

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:)	Case No. 23-30676-KAC
)	Chapter 13
Lynn M. Connolly,)	
)	MEMORANDUM OF LAW IN
)	SUPPORT OF DEBTOR'S MOTION TO
)	AVOID JUDGMENT LIENS
Debtor.)	

TO: Chapter 13 Trustee Gregory Burrell; U.S. Trustee; American Express National Bank; Midland Credit Management, Inc.; and all creditors of the above-named debtor.

1. The debtor Lynn Michele Connolly submits this Memorandum of Law in support of her motion to avoid the judicial liens of American Express National Bank, and Midland Credit Management, Inc.

2. As stated in the Notice of Motion and Motion, the debtor seeks to avoid the following judgment liens:

A. Judgment against Lynn Connolly, in favor of American Express National Bank, docketed September 16, 2021, in District Court (Ramsey County Civil) Case No. 62-CV-21-4873, in the amount of \$34,146.94.

B. Judgment against Lynn Connolly, in favor of Midland Credit Management, Inc., docketed February 14, 2022, in District Court (Ramsey County Civil) Case No. 62-CV-22-800, in the amount of \$1,957.31.

The debtor lives at the real property located at 105 Rose Ave. W., St. Paul, Minnesota 55107. The legal description is Lot 21, Block 2, Stinson's Rice Street Addition to City of St. Paul, Ramsey County, Minnesota. The debtor has owned and occupied this home for over thirty-six years. She owned it together with her husband who died of

esophageal cancer on December 23, 2022. The mortgage was foreclosed on October 12, 2022. The debtor filed chapter 13 on April 11, 2023, the effect of which was to extend the redemption period to June 12, 2023. The court has not yet confirmed a chapter 13 plan. The section 341(a) meeting was held and concluded on May 10, 2023. The debtor has signed a purchase agreement to sell the property for \$245,000.00. The closing is scheduled for May 31, 2023, but it is likely that the closing will take place a few days later (but not later than June 12, 2023). The debtor has filed a motion to reduce the time to object to the debtor's claims of exempt property, and that motion has been continued by the court to May 24, 2023, at 10:00 a.m.

3. As stated in the motion, there are several liens against the property:

<u>U.S. Bank (mortgage)</u>	\$151,083.91
<u>American Express National Bank judgment</u>	\$34,146.94
<u>Midland Credit Management judgment</u>	\$1,957.31
<u>Synchrony Bank judgment</u> (owed by Robert Connolly, not the subject of this motion)	\$2,600.00
<u>American Express National Bank judgment</u> (owed by Robert Connolly, not the subject of this motion)	\$4,838.89

The total of these liens is \$194,627.05. The property has a fair market value of \$245,000.00. In the absence of any liens, the debtor could claim an exemption of \$245,000.00. This means that the judicial lien of American Express National Bank for \$34,146.94 impairs the debtor's exemption within the meaning of 11 U.S.C. section 522(f), and it means that the judicial lien of Midland Credit Management, Inc., for \$1,957.31 impairs the debtor's exemption within the meaning of section 522(f).

4. According to 11 U.S.C. section 522(f)(1), the debtor may avoid the fixing of a lien on an interest of the debtor in property to the extent that such lien impairs an

exemption to which the debtor would otherwise have been entitled, so long as such lien is a judicial lien, and so long as the debt that is secured by such lien is not a debt for a domestic support obligation. The debts that are secured by the judgment liens of American Express, and Midland Credit Management, are consumer credit accounts not within the definition of a domestic support obligation.

5. 11 U.S.C. § 522(f)(2) provides the formula to determine what amounts to an impairment. That section states:

... a lien shall be considered to impair an exemption to the extent that the sum of—

- (i) the lien;
- (ii) all other liens on the property; and
- (iii) the amount of the exemption that the debtor could claim if there were no liens on the property;

exceeds the value that the debtor's interest in the property would have in the absence of any liens.

In this case the total of the two judicial liens as stated in the motion is \$36,104.25 (\$34,146.94 + \$1,957.31 = \$36,104.25). All other liens on the property total \$158,522.80 (\$151,089.91 mortgage + \$2,600.00 husband's judgment + \$4,838.89 husband's judgment = \$158,522.80). The amount of the exemption that the debtor could claim if there were no liens on the property is \$245,000.00, the fair market value (the end result is the same if the Schedule C valuation of \$250,000.00 is used). The sum of these amounts is \$439,627.05 (\$36,104.25 + \$158,522.80 + \$245,000.00 = \$439,627.05). In the absence of any liens the debtor's interest in this real estate would be \$245,000.00. Since \$439,627.05 exceeds \$245,000.00 the judicial liens noted in the motion impair the debtor's homestead real estate exemption in excess of the total of the three judicial liens.

6. It should be noted that the provisions of Minnesota statutes section 510.01, et seq., provide for an exemption from legal process of creditors in the amount of \$480,000.00 for a debtor's interest in his or her homestead real estate, so long as the debtor owns and occupies the real property. In the case at hand, the debtor has, at all times relevant, owned and occupied the real property which is the subject of this motion. This means that, in the absence of this bankruptcy proceeding, if the debtor were to bring an action in state court seeking an order that the two judgment liens were not valid liens on the subject real property, or if a creditor of the debtor were to commence an action in state court to attach and sell the real property at issue, the state court would order that the two judgment liens at issue were not liens on the real property, by reason of Minnesota statutes section 510.01. This is because the debtor owns and occupies the real property, and because the value of the debtor's interest is less than \$480,000.00. For the bankruptcy court to avoid the two judgment liens is simply to place all the parties exactly where they would be if a state court were deciding the validity of such liens.

7. Based upon the foregoing, the debtor requests that the court grant the debtor's motion to avoid the judicial liens of American Express National Bank and Midland Credit Management, Inc.

Respectfully submitted,

May 17, 2023

Date

/s/ Craig W. Andresen

Craig W. Andresen, #186557

Attorney for Debtor

2001 Killebrew Dr., # 150

Bloomington, MN 55425

(952) 831-1995

craig@andresenlaw.com

Fill in this information to identify your case:

Debtor 1	Lynn Michele Connolly		
	First Name	Middle Name	Last Name
Debtor 2 (Spouse if, filing)			
	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	DISTRICT OF MINNESOTA		
Case number (if known)	23-30676		

☐ Check if this is an amended filing

Official Form 106C

Schedule C: The Property You Claim as Exempt

4/22

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. Using the property you listed on *Schedule A/B: Property* (Official Form 106A/B) as your source, list the property that you claim as exempt. If more space is needed, fill out and attach to this page as many copies of *Part 2: Additional Page* as necessary. On the top of any additional pages, write your name and case number (if known).

For each item of property you claim as exempt, you must specify the amount of the exemption you claim. One way of doing so is to state a specific dollar amount as exempt. Alternatively, you may claim the full fair market value of the property being exempted up to the amount of any applicable statutory limit. Some exemptions—such as those for health aids, rights to receive certain benefits, and tax-exempt retirement funds—may be unlimited in dollar amount. However, if you claim an exemption of 100% of fair market value under a law that limits the exemption to a particular dollar amount and the value of the property is determined to exceed that amount, your exemption would be limited to the applicable statutory amount.

Part 1: Identify the Property You Claim as Exempt

1. Which set of exemptions are you claiming? Check one only, even if your spouse is filing with you.

- ☒ You are claiming state and federal nonbankruptcy exemptions. 11 U.S.C. § 522(b)(3)
- ☐ You are claiming federal exemptions. 11 U.S.C. § 522(b)(2)

2. For any property you list on *Schedule A/B* that you claim as exempt, fill in the information below.

Brief description of the property and line on <i>Schedule A/B</i> that lists this property	Current value of the portion you own <small>Copy the value from <i>Schedule A/B</i></small>	Amount of the exemption you claim <small>Check only one box for each exemption.</small>	Specific laws that allow exemption
105 Rose Ave. W. Saint Paul, MN 55117 Ramsey County Lot 21, Block 2, Stinson's Rice Street Addition to City of St. Paul, Located in Ramsey County, State of Minnesota. <small>Line from <i>Schedule A/B</i>: 1.1</small>	\$250,000.00	<input checked="" type="checkbox"/> \$250,000.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Minn. Stat. §§ 510.01, 510.02
2015 Ford Explorer 57,000 miles (value is currently \$8,000 - value will be \$12,000 after repairs) <small>Line from <i>Schedule A/B</i>: 3.1</small>	\$12,000.00	<input checked="" type="checkbox"/> \$5,200.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Minn. Stat. § 550.37 subd. 12a
Household Goods <small>Line from <i>Schedule A/B</i>: 6.1</small>	\$2,000.00	<input checked="" type="checkbox"/> \$2,000.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Minn. Stat. § 550.37 subd. 4(b)
Lawnmower, snowblower <small>Line from <i>Schedule A/B</i>: 6.2</small>	\$75.00	<input checked="" type="checkbox"/> \$75.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Minn. Stat. § 550.37 subd. 4(b)

Brief description of the property and line on Schedule A/B that lists this property	Current value of the portion you own <small>Copy the value from Schedule A/B</small>	Amount of the exemption you claim <small>Check only one box for each exemption.</small>	Specific laws that allow exemption
Household type tools Line from <i>Schedule A/B</i> : 6.3	<u>\$250.00</u>	<input checked="" type="checkbox"/> <u>\$250.00</u> <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Minn. Stat. § 550.37 subd. 4(b)
cell phone Line from <i>Schedule A/B</i> : 7.1	<u>\$150.00</u>	<input checked="" type="checkbox"/> <u>\$150.00</u> <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Minn. Stat. § 550.37 subd. 4(b)
cd player Line from <i>Schedule A/B</i> : 7.2	<u>\$25.00</u>	<input checked="" type="checkbox"/> <u>\$25.00</u> <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Minn. Stat. § 550.37 subd. 4(b)
2 televisions Line from <i>Schedule A/B</i> : 7.3	<u>\$250.00</u>	<input checked="" type="checkbox"/> <u>\$250.00</u> <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Minn. Stat. § 550.37 subd. 4(b)
HP laptop \$25 printer \$25 Line from <i>Schedule A/B</i> : 7.4	<u>\$50.00</u>	<input checked="" type="checkbox"/> <u>\$50.00</u> <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Minn. Stat. § 550.37 subd. 4(b)
Clothing Line from <i>Schedule A/B</i> : 11.1	<u>\$250.00</u>	<input checked="" type="checkbox"/> <u>\$250.00</u> <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Minn. Stat. § 550.37 subd. 4(a)
Wedding Rings Line from <i>Schedule A/B</i> : 12.1	<u>\$1,000.00</u>	<input checked="" type="checkbox"/> <u>\$1,000.00</u> <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Minn. Stat. § 550.37 subd. 4(c)
Cash on hand Line from <i>Schedule A/B</i> : 16.1	<u>\$50.00</u>	<input checked="" type="checkbox"/> <u>\$50.00</u> <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	42 U.S.C. § 407
Associated Bank checking account Line from <i>Schedule A/B</i> : 17.1	<u>\$430.00</u>	<input checked="" type="checkbox"/> <u>\$430.00</u> <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	42 U.S.C. § 407
Royal Credit Unio checking \$2,098, Savings \$10 Line from <i>Schedule A/B</i> : 17.2	<u>\$2,108.00</u>	<input checked="" type="checkbox"/> <u>\$2,108.00</u> <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	42 U.S.C. § 407
insurance coverage for damage to 2015 Ford Explorer Line from <i>Schedule A/B</i> : 30.1	<u>\$4,000.00</u>	<input checked="" type="checkbox"/> <u>\$4,000.00</u> <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Minn. Stat. § 550.37 subd. 9

Debtor 1 **Lynn Michele Connolly**

Case number (if known) **23-30676**

Brief description of the property and line on Schedule A/B that lists this property	Current value of the portion you own <small>Copy the value from Schedule A/B</small>	Amount of the exemption you claim <small>Check only one box for each exemption.</small>	Specific laws that allow exemption
Refunds of AIG Life Insurance premiums Line from Schedule A/B: 31.1	\$300.00	<input checked="" type="checkbox"/> \$300.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Minn. Stat. § 550.37 subd. 10

3. **Are you claiming a homestead exemption of more than \$189,050?**

(Subject to adjustment on 4/01/25 and every 3 years after that for cases filed on or after the date of adjustment.)

☐ No

☒ Yes. Did you acquire the property covered by the exemption within 1,215 days before you filed this case?

☒ No

☐ Yes

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

Lynn M. Connolly,

BKY No. 23-30676-KAC

Debtor.

Chapter 13

ORDER AVOIDING LIENS

The hearing on the above matter came on before the court on May 31, 2023. Appearances were noted in the court's record. Based upon on the proceedings had thereon, the court hereby makes the following **ORDER**:

1. The debtor's motion to avoid the judgment liens of American Express National Bank, and Midland Credit Management, Inc., is hereby granted.

2, The judgment lien of American Express National Bank, docketed September 16, 2021, in District Court (Ramsey County Civil) Case No. 62-CV-21-4873, in the amount of \$34,146.94, and the judgment lien of Midland Credit Management, Inc., docketed February 14, 2022, in District Court (Ramsey County Civil) Case No. 62-CV-22-800, in the amount of \$1,957.31, as to the following described real property are hereby nullified and avoided:

Lot 21, Block 2, Stinson's Rice Street Addition to the City of St. Paul, Ramsey County, Minnesota.

DATED:

Honorable Katherine A. Constantine
Chief U.S. Bankruptcy Court Judge

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re: Lynn M. Connolly

Case No. 23-30676-KAC

Debtor(s).

SIGNATURE DECLARATION

- ☐ PETITION, SCHEDULES & STATEMENTS
☐ CHAPTER 13 PLAN
☐ VOLUNTARY CONVERSION, SCHEDULES & STATEMENTS
☐ AMENDMENT TO PETITION, SCHEDULES & STATEMENTS
☐ MODIFIED CHAPTER 13 PLAN
☒ OTHER: PLEASE DESCRIBE: Motion and Memorandum of Law to Avoid Judgment Liens

I [We], the undersigned debtor(s) or authorized representative of the debtor, make the following declarations under penalty of perjury:

1. The information I have given my attorney for the electronically filed petition, statements, schedules, amendments, and/or chapter 13 plan, as indicated above, is true and correct;
2. The Social Security Number or Tax Identification Number I have given to my attorney for entry into the court's Case Management/Electronic Case Filing (CM/ECF) system as a part of the electronic commencement of the above-referenced case is true and correct;
3. **[individual debtors only]** If no Social Security Number was provided as described in paragraph 2 above, it is because I do not have a Social Security Number;
4. I consent to my attorney electronically filing with the United States Bankruptcy Court my petition, statements and schedules, amendments, and/or chapter 13 plan, as indicated above, together with a scanned image of this Signature Declaration;
5. My electronic signature contained on the documents filed with the Bankruptcy Court has the same effect as if it were my original signature on those documents; and
6. **[corporate and partnership debtors only]** I have been authorized to file this petition on behalf of the debtor.

Date: 5/17/23

x /s/Lynn M. Connolly
Signature of Debtor 1 or Authorized
Representative

Lynn M. Connolly
Printed name of Debtor 1 or Authorized
Representative

x _____
Signature of Debtor 2

Printed Name of Debtor 2

In re:

Lynn M. Connolly,

Debtor(s).

U.S. Bankruptcy Court
District of Minnesota

AFFIDAVIT OF SERVICE

BKY NO. 23-30676-KAC

I, Craig W. Andresen, attorney licensed to practice law in this court, with office address of 2001 Killebrew Dr., Suite 150, Bloomington, Minnesota 55425, declare under penalty of perjury that on **May 17, 2023**, I served the **Notice of Hearing on Motion to Avoid Judgment Liens of American Express National Bank and Midland Credit Management, Inc.** on the following parties/entities as indicated below:

BY CERTIFIED BY U.S. MAIL:

Chief Executive Officer
Midland Credit Management, Inc.
350 Camino de le Reina, Suite 350
San Diego, CA 92108

American Express National Bank AENB
c/o Zwicker & Associates PC
P.O. Box 9043
Andover, MA 01810-1041

Chief Executive Officer
Comenity Capital Bank
12921 S. Vista Station Blvd.
Draper UT 84020

JP Morgan Chase Bank
c/o Robertson Anschulz Crane & Partners PLLC
6409 Congress Ave., Suite 100
Boca Raton, FL 33487

Chief Executive Officer
Associated Bank, N.A.
1305 Main St.
Stevens Point, WI 54481

Chief Executive Officer
Barclay's Bank
PO Box 70378

Philadelphia, PA 19176

Chief Executive Officer
Citibank, N.A.
701 E. 60th St. N.
Sioux Falls SD 57104

Chief Executive Officer
Capital One, N.A.
American Infosource as Agent
4515 N. Santa Fe Ave.
Oklahoma City OK 73118

Chief Executive Officer
Synchrony Bank
777 Long Ridge Road
Stamford, CT 06902

Chief Executive Officer
U.S. Bank
800 Nicollet Mall
Minneapolis, MN 55402

BY FIRST CLASS U.S. MAIL:

Chief Executive Officer
American Express National Bank
115 W. Towne Ridge Pkwy.
Sandy, UT 84070

District Counsel of the IRS
380 Jackson St., Suite 650
St Paul, MN 55101

District Director of the IRS
30 E. 7th St.
Stop 5700, Suite 1222
St Paul MN 55101

US Attorney's Office
ATTN: Civil Process Clerk
316 N Robert St, # 404
St Paul MN 55101

Office of the Attorney General
US Dept of Justice

950 Pennsylvania Ave.
Washington DC 20530-0001

AND ALSO THE ATTACHED LIST

I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: May 17, 2023.

Signed: /e/ Craig W. Andresen
Craig W. Andresen, Attorney

Label Matrix for local noticing
0864-3
Case 23-30676
District of Minnesota
St Paul
Sat May 13 20:19:24 CDT 2023

AMERICAN EXPRESS
PO BOX 297871
FORT LAUDERDALE FL 33329-7871

American Express National Bank, AENB
c/o Zwicker and Associates, P.C.
Attorneys/Agents for Creditor
P.O. Box 9043
Andover, MA 01810-0943

CARRINGTON MORTGAGE
1600 SO DOUGLASS RD STE 200A
ANAHEIM CA 92806-5948

CHRISTOPHER AND BANKS
6740 SHADY OAK RD
EDEN PRAIRIE MN 55344-3433

COMENITY BANK
PO BOX 182789
COLUMBUS OH 43218-2789

Capital One N.A.
by American InfoSource as agent
PO Box 71083
Charlotte, NC 28272-1083

(p) INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

JPMorgan Chase Bank, N.A.
s/b/m/t Chase Bank USA, N.A.
c/o Robertson, Anschutz, Schneid,
Crane & Partners, PLLC
6409 Congress Avenue, Suite 100
Boca Raton, FL 33487-2853

RANDALL S MILLER ASSOCS
8525 EDINBROOK CROSSING N
STE 210
BROOKLYN PARK MN 55443-1968

St Paul
200 Warren E. Burger Federal Building
and U.S. Courthouse
316 N Robert St
St Paul, MN 55101-1495

ASSOCIATED BANK
200 NORTH ADAMS STREET
GREEN BAY WI 54301-5174

BARCLAYS BANK
CARD SERVICES
PO BOX 8803
WILMINGTON DE 19899-8803

CENTURY LINK
404 BROCK DRIVE
BLOOMINGTON IL 61701-2654

CITI BANK
PO BOX 6241
SIOUX FALLS SD 57117-6241

COMENITY BANK
PO BOX 18279
COLUMBUS OH 43218

DIAMOND RESORTS
10600 WEST CHARLESTON BLVD
LAS VEGAS NV 89135-1260

INTERNAL REVENUE SERVICE
PO BOX 7346
PHILADELPHIA PA 19101-7346

MESSERLI AND KRAMER PA
3033 CAMPUS DR STE 250
PLYMOUTH MN 55441-2662

SAMS CLUB
PO BOX 965003
ORLANDO FL 32896-5003

AMERICAN EXPRESS
C/O ZWICKER AND ASSOCS
3050 METRO DR STE 115
MPLS MN 55425-1678

ASSOCIATED BANK, NA
1305 MAIN STREET
STEVENS POINT, WI 54481-2898

CAPITAL ONE
PO BOX 31293
SALT LAKE CITY UT 84131-0293

CENTURY LINK/CONSTAR FIN SERVS
10400 N 25TH SUITE 100
PHOENIX AZ 85021-1610

CITIBANK C/O PORTFOLIO R SERVS
150 CORPORATE BLVD
NORFOLK VA 23502-4952

COMENITY BANK
PO BOX 650972
DALLAS TX 75265-0972

DIAMOND RESORTS
8415 SOUTHPARK CIR STE 150
ORLANDO FL 32819-9008

(p) JPMORGAN CHASE BANK N A
BANKRUPTCY MAIL INTAKE TEAM
700 KANSAS LANE FLOOR 01
MONROE LA 71203-4774

MIDLAND FUNDING
3033 CAMPUS DR STE 250
PLYMOUTH MN 55441-2662

SYNCHRONY BANK
PO BOX 960061
ORLANDO FL 32896-0061

SYNCHRONY BBANK
C/O MICHAEL ROPELLA ATTY
7300 147TH ST STE 307
ORLANDO FL 32896-0001

T MOBILE
C/O IC SYSTEMS
444 HWY 96 EAST
ST PAUL MN 55127-2557

(p)T MOBILE
C O AMERICAN INFOSOURCE LP
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

T Mobile/T-Mobile USA Inc
by American InfoSource as agent
PO Box 248848
Oklahoma City, OK 73124-8848

US BANK TRUST NATL ASSN
ATTENTION CORP VICE PRESIDENT
60 LIVINGSTON AVE - EP-MN-WS3C
ST PAUL MN 55107-2292

US Trustee
1015 US Courthouse
300 S 4th St
Minneapolis, MN 55415-3070

WYNDHAM VACATION RESORTS
22 SYLVAN WAY
PARSIPPANY NJ 07054-3801

XCEL ENERGY
3215 COMMERCE ST
LA CROSSE WI 54603-1755

XCEL ENERGY
PO BOX 1176
LONGMONT CO 80502-1176

Craig W. Andresen
Craig W. Andresen Law Office
2001 Killebrew Dr. Ste 150
Bloomington, MN 55425-3851

Gregory A Burrell
100 South Fifth Street
Suite 480
Minneapolis, MN 55402-1250

Lynn Michele Connolly
105 Rose Ave. W.
Saint Paul, MN 55117-4927

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

INTERNAL REVENUE SERVICE
KANSAS CITY MO 64999

(d)INTERNAL REVENUE SERVICE
STOP 5700
30 EAST 7TH STREET SUITE 1222
ST PAUL MN 55101-4940

JPMCB
PO BOX 15369
WILMINGTON DE 19850

T MOBILE
PO BOX 53410
BELLEVUE WA 98015-3410

End of Label Matrix
Mailable recipients 41
Bypassed recipients 0
Total 41